

10 ADMINISTRATION10.42 Records Retention

Effective: 6/1/96 Revised: 11/01/02

POLICY: Each project shall maintain and retain full and complete records concerning participants and program operations.

PROCEDURE:

A. RETENTION PERIOD

All records pertinent to a WIC contract shall be retained for a period of at least three (3) years following the final expenditure report, which is 150 days after the end of the fiscal year. (This period may be longer as required by the agency administering WIC). June 1 of the following year marks the end of the retention period. For example, FY 2001 (January 2001 through December 2001) records may be disposed after June 1, 2005.

B. MICROFILM/MICROFICHE

Microfilm/Microfiche are considered legal records for retention purposes, with the following exceptions:

- 1. If any litigation, claim, or audit involving the WIC project is started before the conclusion of the close of the three year period, the records must be retained until all litigation, claims, or audits involving the records have been resolved.
- 2. Inventory records for nonexpendable personal property purchased in whole or part with WIC contract funds shall be retained for three (3) years after the due date of the final Fiscal Report for the year during which the property was purchased.
- 3. When records are transferred to the State or Federal government, the local agency is no longer responsible for guaranteeing retention of the records for the specified time.

C. RECORDS SHALL INCLUDE

Records shall include but are not limited to financial operations, food draft issuance, equipment purchases and inventory, nutrition education, civil rights and fair hearing procedures, and participant certification. Records related to participant certification includes the documentation which supports the eligibility and/or ineligibility for each certification period in the three year retention period, i.e. questionnaires, growth grids, charting notes, flow sheets, termination/ineligibility letter and the most recent printed certification form indicating participant history, etc. ADP reports shall be retained according to the Reports Section of the System Manual.



D. ACCESS TO RECORDS

All records pertaining to the project funded through the WIC contract shall be made available at any time during the project period or the retention period described above to representatives of the state and/or federal government for review and/or audit.